

HEARING DATE AND TIME: April 8, 2015 at 10:00 a.m. (ET)

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*Attorney for Russell Investments
and its Affiliated Entities*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (SCC)
	:
Debtors.	: (Jointly Administered)
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**JOINDER OF RUSSELL INVESTMENTS AND ITS
AFFILIATED ENTITIES TO OBJECTIONS TO
MOTION TO ALLOW DISCLOSURE OF THE
DERIVATIVES QUESTIONNAIRES PURSUANT
TO SECTION 107(a) OF THE BANKRUPTCY CODE**

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

Russell Investments, as investment advisor and/or manager to certain of its
affiliated entities (the “Affiliated Entities,” and together with Russell Investments, “Russell”),¹

¹ The Affiliated Entities are as follows: (i) Civil Aviation Authority Pension Scheme, (ii) Nochu Russell Multi-Strategy Global Bond Fund, (iii) CEBFT Russell Fixed Income II Fund, (iv) CEBFT Russell Long Duration Fixed Income Fund, (v) CEBFT Russell Multi-Manager Bond Fund, (vi) Frank Russell Multi-Strategy Global Bond Fund, (vii) Frank Russell US Bond Fund, (viii) HYDRO ONE PENSION PLAN, (ix) Retirement Plan for Employees of Aetna Services, Inc. (AET), (x) Reynolds American Inc. Defined Benefit Master Trust, (xi) RGF Russell Global Equity Fund, (xii) RIC Emerging Markets, (xiii) RIC II plc The Global Bond (Euro Hedged) Fund, (xiv) RIC III plc The Active Currency Fund, (xv) RIC IV plc The Alpha Fund, (xvi) RIC plc The Global Bond Fund, (xvii) RIC plc the U.S. Bond Fund, (xviii) RIC Russell Short Duration Bond Fund, (xix) RIC Russell Strategic Bond Fund, (xx) RIC-OMIGSA Global Bond Fund, (xxi) RIC-OMIGSA Global Money Market Fund, (xxii) RIF Core Bond Fund, (xxiii) RIFL LLC Russell International Equity Fund, (xxiv) RIML Russell International Bond Fund - \$A Hedged, (xxv) GPF (THAILAND) INVESTMENT FUND, (xxvi) MSMM Funds PLC Global Bond (Euro Hedged) Fund, (xxvii) MSMM Funds PLC Global Bond Fund, (xxviii) Russell Global Equity, (xxix) RUT The International Bond Fund, (xxx) San Diego County Employee Retirement Systems, (xxxi) J Sainsbury Common Investment Fund, (xxxii) J Sainsbury Common Investment Fund Limited, (xxxiii) Ohio SERS

by its undersigned counsel, hereby joins, to the extent set forth herein, the Objections (defined below) to the *Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code* [Dkt. No. 48939] (the “Motion”).² In support of this joinder (this “Joinder”), Russell respectfully states as follows:

1. On March 19, 2015, Lehman and the Creditors Committee filed the *Motion to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code* [Dkt. No. 48939] (the “Motion”).

2. Prior to the filing of the Motion, Russell uploaded its Derivative Questionnaires to the Lehman claim website in reliance on the Bar Date Order, which provides, in relevant part, that “[t]he information submitted on the website <http://www.lehman-claims.com> in respect of Derivative Contracts and Guarantees will not be accessible on the website other than by the party that submitted such information, the Debtors, the Creditors’ Committee and their respective advisors and counsel” See Bar Date Order at 9.

3. Russell hereby joins and incorporate the objection filed Westpac Banking Corp. [Dkt. No. 49022], Pentwater Growth Fund Limited and Pentwater Credit Partners Fund Ltd. [Dkt. No. 49023], Bank of Montreal [Dkt. No. 49032], Citadel Energy Investments Ltd. [Dkt. No. 49030], and National Australia Bank Limited [Dkt. No. 49029] (collectively the “Objections”).

Core Full, (xxxiv) Oregon Public Employees Retirement System, (xxxv) Reynolds America Inc. Defined Benefit Master Trust, (xxxvi) Wyoming Retirement System, (xxxvii) Xerox Pensions Limited, (xxxviii) Xerox Pensions Ltd. (for Xerox Pension Scheme), (xxxix) KAISER FOUNDATION HOSPITALS INC, and (xl) SHROPSHIRE COUNTY PENSION FUND.

² Each capitalized term used but not defined herein shall have the meaning ascribed to it in the Motion.

4. Russell concurs with and joins in the legal arguments advanced in the Objections as if such arguments applied equally with respect to, and in connection with, Russell and the Motion.

5. Russell respectfully requests that the relief requested in the Motion be denied, and if granted, that it be modified to provide that (i) Lehman may not produce or disclose the Derivative Questionnaires as discovery materials in Lehman-related adversary proceedings or claims objections unless Lehman and the party receiving such production or disclosure agree in writing that the Derivative Questionnaires shall remain confidential and be used only for the purpose of litigating the adversary proceeding or claim objection in which they are produced and (ii) any materials relating to the Derivative Questionnaires that are produced or disclosed pursuant to such a confidentially agreement may not be later filed publicly without filing a motion with the Court seeking disclosure that is subject to notice and a hearing.

6. Russell reserves the right to amend or supplement this Joinder based upon any facts or arguments that come to light prior to the hearing on these issues.

Dated: New York, New York
March 30, 2015

Respectfully Submitted,

DECHERT LLP

By: /s/ Shmuel Vasser

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